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August 12, 2009

Jennifer J. Johnson, Secretary
Board of Governors
Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551
RE: Docket No. R-1364

Dear Secretary Johnson:

I am writing on behalf of my credit union, Choice Community CU, to comment on Credit Card Accountability and Disclosure Act of 2009 (CARD Act). We are a small-size financial institution with \$47 million in assets, 27 employees and serve 9,800 members. We support the intent of Congress and the Fed to establish fair and transparent practices pertaining to open-end consumer credit plans. However, we have concerns about the operational complexities of complying with the interim final rules, particularly the 21-day statement provision effective on August 20. We have a genuine concern that this Act will actually have a negative impact on our members.

I manage the IT department and the added expense for our data processor to convert all loans to a monthly payment will cost approximately \$800.00 plus staff time for testing the changes. We may incur additional programming cost with the February requirements.

While we would implore you to reconsider the "open end lending" portion of the legislation, we respectfully request, at a minimum, you extend the time period for compliance for credit unions.

Sincerely,

Cricket W. Pitts
IT Manager